

WEIL, GOTSHAL & MANGES LLP

Stephen Karotkin (*pro hac vice*)
(stephen.karotkin@weil.com)
Ray C. Schrock, P.C. (*pro hac vice*)
(ray.schrock@weil.com)
Theodore Tsekerides (*pro hac vice*)
(theodore.tsekerides@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
New York, NY 10153-0119
Tel: (212) 310-8000
Fax: (212) 310-8007

KELLER BENVENUTTI KIM LLP

Tobias S. Keller (#151445)
(tkeller@kbbkllp.com)
Peter J. Benvenutti (#60566)
(pbenvenutti@kbbkllp.com)
Jane Kim (#298192)
(jkim@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: (415) 496-6723
Fax: (415) 636-9251

Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric
Company
☐ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

**NOTICE OF OPPORTUNITY FOR HEARING
ON DEBTOR'S MOTION PURSUANT TO
FED. R. BANKR. P. 4001(d) TO APPROVE
STIPULATION FOR ADEQUATE
PROTECTION OF SETOFF RIGHTS OF
IMERYS FILTRATION MINERALS, INC.**

Objection Deadline: April 22, 2020
4:00 pm (Pacific Time)

**No hearing requested absent timely objection. If
timely objection is filed, hearing reserved for:**

Date: May 12, 2020
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 **PLEASE TAKE NOTICE** that on January 29, 2019 (the “**Petition Date**”), PG&E
2 Corporation and Pacific Gas and Electric Company, as debtors and debtors in possession (the
3 “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), each filed a voluntary
4 petition for relief under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the Northern District of California (San Francisco Division) (the “**Bankruptcy Court**”).

5 **PLEASE TAKE FURTHER NOTICE** that on April 1, 2020, Debtor Pacific Gas and Electric
6 Company filed the *Motion Pursuant to Fed. R. Bankr. P. 4001(d) to Approve Stipulation for Adequate Protection of Setoff Rights of Imerys Filtration Minerals, Inc.* [Dkt. No. 6572] (the “**Motion**”) and the
7 Declaration of Kelly J. Lack [Dkt. No. 6573] in support thereof.

8 **PLEASE TAKE FURTHER NOTICE** that

9 **Any objection to the requested relief, or a request for hearing on the matter, must be filed**
10 **and served upon the initiating party within 21 days of mailing the notice;**

11 **Any objection or request for a hearing must be accompanied by any declarations or**
12 **memoranda of law any requesting party wishes to present in support of its position;**

13 **If there is no timely objection to the requested relief or a request for hearing, the court**
14 **may enter an order granting the relief by default.**

15 **In the event of a timely objection or request for hearing:**

16 **The tentative hearing date, location and time are: May 12, 2020, at 10:00 a.m. (Pacific**
17 **Time) in the courtroom of the Honorable Dennis Montali, United States Bankruptcy**
18 **Judge, Courtroom 17, 16th Floor, 450 Golden Gate Avenue, San Francisco, California**
19 **94102.**

20 **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses must be filed and
21 served on all “Standard Parties” as defined in, and in accordance with, the *Second Amended Order*
22 *Implementing Certain Notice and Case Management Procedures* entered on May 14, 2019 [Dkt No.
23 1996] (the “**Case Management Order**”).

24 **PLEASE TAKE FURTHER NOTICE** that copies of the Motion and its supporting papers
25 can be viewed and/or obtained: (i) by accessing the Court’s website at <http://www.canb.uscourts.gov>,
26 (ii) by contacting the Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA
27 94102, or (iii) from the Debtors’ notice and claims agent, Prime Clerk LLC , at
28 <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based
parties; or +1 (929) 333-8977 for International parties or by e-mail at: pgeinfo@primeclerk.com. Note
that a PACER password is needed to access documents on the Bankruptcy Court’s website.

//

//

//

1 Dated: April 1, 2020

WEIL, GOTSHAL & MANGES LLP
KELLER BENVENUTTI KIM LLP

/s/ Dara L. Silveira

Dara L. Silveira

Attorneys for Debtors and Debtors in Possession

2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28